

BILLY J. WILLIAMS, OSB #901366  
United States Attorney  
District of Oregon

**WILLIAM M. NARUS, CASB #243633**

Assistant United States Attorney

[William.Narus@usdoj.gov](mailto:William.Narus@usdoj.gov)

1000 SW Third Avenue, Suite 600

Portland, OR 97204-2902

Telephone: (503) 727-1000

Attorneys for United States of America

**UNITED STATES DISTRICT COURT**

**DISTRICT OF OREGON**

**3:20-mj-176**

---

**UNITED STATES OF AMERICA,**

**v.**

**EDWARD THOMAS SCHINZING,**

**Defendant.**

**MOTION TO SEAL COMPLAINT AND  
ARREST WARRANT AND RELATED  
MATERIALS**

**UNDER SEAL**

The United States of America moves the Court for an order sealing the Criminal Complaint, attachments thereto, the supporting Affidavit and attachments, the Arrest Warrant, the return, this motion, and the resulting order because, as referenced in the Affidavit supporting the Criminal Complaint and Arrest Warrant, disclosure of the Criminal Complaint documents at this time may result in flight from prosecution, the destruction of or tampering with evidence, intimidation of potential witnesses, and/or otherwise seriously jeopardize an investigation.

**Motion to Seal Complaint and Arrest Warrant and Related  
Materials**

**Page 1**

Revised April 2018

WHEREFORE, the government requests that this Motion, the Order, and the Criminal Complaint, attachments thereto, and Affidavit for Complaint and Arrest Warrants for the defendants described herein, be filed under seal, except for a copy to the Affiant and investigating agency for their investigative needs.

The government further requests that the government be authorized to provide copies of the Criminal Complaint, attachments thereto, and Affidavit for Complaint and Arrest Warrants and any further pleadings to attorneys for any defendants in this case as part of its discovery obligations.

Dated: July 27, 2020

Respectfully submitted,

BILLY J. WILLIAMS  
United States Attorney

/s/ William M. Narus  
WILLIAM M. NARUS, CASB #243633  
Assistant United States Attorney